

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GRAPHIC ARTS MUTUAL
INSURANCE COMPANY

Plaintiff,

V.

:
:
:
:
:
: Civ. Action No. 1:06-CV-0246 (JJF)

INDIAN RIVER SCHOOL DISTRICT
INDIAN RIVER SCHOOL BOARD,
HARVEY L. WALLS, MARK A. ISAACS,
JOHN M. EVANS, RICHARD H. COHEE,
GREGORY A. HASTINGS, NINA LOU
BUNTING, CHARLES M. BIRELEY,
DONALD G. HATIER, REGINALD L. HELMS,
M. ELAINE McCABE, LOIS M. HOBBS,
and EARL J. SAVAGE

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS
TO RESPOND TO PLAINTIFF'S COMPLAINT**

The defendants, by and through its undersigned attorneys, Drinker Biddle & Reath LLP, hereby submit this unopposed motion for an order extending the time for defendants to respond to plaintiff's complaint, and in support thereof aver as follows:

1. On April 12, 2006, Graphic Arts Mutual Insurance Company (“Graphic Arts”) filed a complaint for declaratory relief and restitution/quantum meruit.
2. The complaint alleged that the defendants breached their insurance contract in connection with an underlying lawsuit, *Dobrich, et. al. v. Indian River School District, et. al.*, No. 05-00120 (D.De.). Graphic Arts seeks declaratory and other relief relative to its defense and indemnity obligations under the applicable insurance contract.
3. The plaintiff named fourteen separate defendants. Their answers were originally due at various times between May 3, 2006 through May 15, 2006.

4. On May 2, 2006, Drinker Biddle & Reath LLP was retained by each of the defendants to represent them in the above-captioned litigation.

5. On May 3, 2006, the parties filed a stipulation to extend the time to answer, move or otherwise plead in response to plaintiff's complaint to May 26, 2006.

6. On May 10, 2006, counsel for both parties had a meeting to discuss this lawsuit and the underlying lawsuit.

7. At the meeting and shortly thereafter, the parties determined that it would be appropriate to pursue a global settlement that would involve the underlying lawsuit, for which Drinker Biddle & Reath LLP also serves as counsel, as well as this lawsuit.

8. In light of these continuing settlement efforts, and the possibility that this and the underlying lawsuit may be resolved shortly, the defendants request a further extension of time to answer, move, or otherwise plead until June 13, 2006. This extension of time will allow the parties to pursue their settlement efforts.

9. Granting this extension will cause no prejudice to any of the parties. Indeed, Graphic Arts does not oppose this motion.

WHEREFORE, the defendants seek an extension of time through and including June 13, 2006 to answer, move, or otherwise plead to plaintiff's complaint.

Dated: May 25, 2006

Respectfully submitted,

DRINKER BIDDLE & REATH LLP

/s/ Warren Pratt

Warren Pratt (DE Bar I.D. #4334)
DRINKER BIDDLE & REATH LLP
1100 N. Market Street
Suite 1000
Wilmington, DE 19801-1243
(302) 467-4200
(302) 467-4201 fax

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GRAPHIC ARTS MUTUAL
INSURANCE COMPANY

Plaintiff,

V.

1
 2
 3
 4
 5
 6
 7
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25
 26
 27
 28
 29
 30
 31
 32
 33
 34
 35
 36
 37
 38
 39
 40
 41
 42
 43
 44
 45
 46
 47
 48
 49
 50
 51
 52
 53
 54
 55
 56
 57
 58
 59
 60
 61
 62
 63
 64
 65
 66
 67
 68
 69
 70
 71
 72
 73
 74
 75
 76
 77
 78
 79
 80
 81
 82
 83
 84
 85
 86
 87
 88
 89
 90
 91
 92
 93
 94
 95
 96
 97
 98
 99
 100
 101
 102
 103
 104
 105
 106
 107
 108
 109
 110
 111
 112
 113
 114
 115
 116
 117
 118
 119
 120
 121
 122
 123
 124
 125
 126
 127
 128
 129
 130
 131
 132
 133
 134
 135
 136
 137
 138
 139
 140
 141
 142
 143
 144
 145
 146
 147
 148
 149
 150
 151
 152
 153
 154
 155
 156
 157
 158
 159
 160
 161
 162
 163
 164
 165
 166
 167
 168
 169
 170
 171
 172
 173
 174
 175
 176
 177
 178
 179
 180
 181
 182
 183
 184
 185
 186
 187
 188
 189
 190
 191
 192
 193
 194
 195
 196
 197
 198
 199
 200
 201
 202
 203
 204
 205
 206
 207
 208
 209
 210
 211
 212
 213
 214
 215
 216
 217
 218
 219
 220
 221
 222
 223
 224
 225
 226
 227
 228
 229
 230
 231
 232
 233
 234
 235
 236
 237
 238
 239
 240
 241
 242
 243
 244
 245
 246
 247
 248
 249
 250
 251
 252
 253
 254
 255
 256
 257
 258
 259
 260
 261
 262
 263
 264
 265
 266
 267
 268
 269
 270
 271
 272
 273
 274
 275
 276
 277
 278
 279
 280
 281
 282
 283
 284
 285
 286
 287
 288
 289
 290
 291
 292
 293
 294
 295
 296
 297
 298
 299
 300
 301
 302
 303
 304
 305
 306
 307
 308
 309
 310
 311
 312
 313
 314
 315
 316
 317
 318
 319
 320
 321
 322
 323
 324
 325
 326
 327
 328
 329
 330
 331
 332
 333
 334
 335
 336
 337
 338
 339
 340
 341
 342
 343
 344
 345
 346
 347
 348
 349
 350
 351
 352
 353
 354
 355
 356
 357
 358
 359
 360
 361
 362
 363
 364
 365
 366
 367
 368
 369
 370
 371
 372
 373
 374
 375
 376
 377
 378
 379
 380
 381
 382
 383
 384
 385
 386
 387
 388
 389
 390
 391
 392
 393
 394
 395
 396
 397
 398
 399
 400
 401
 402
 403
 404
 405
 406
 407
 408
 409
 410
 411
 412
 413
 414
 415
 416
 417
 418
 419
 420
 421
 422
 423
 424
 425
 426
 427
 428
 429
 430
 431
 432
 433
 434
 435
 436
 437
 438
 439
 440
 441
 442
 443
 444
 445
 446
 447
 448
 449
 450
 451
 452
 453
 454
 455
 456
 457
 458
 459
 460
 461
 462
 463
 464
 465
 466
 467
 468
 469
 470
 471
 472
 473
 474
 475
 476
 477
 478
 479
 480
 481
 482
 483
 484
 485
 486
 487
 488
 489
 490
 491
 492
 493
 494
 495
 496
 497
 498
 499
 500
 501
 502
 503
 504
 505
 506
 507
 508
 509
 510
 511
 512
 513
 514
 515
 516
 517
 518
 519
 520
 521
 522
 523
 524
 525

: Civ. Action No. 1:06-CV-0246 (JJF)

INDIAN RIVER SCHOOL DISTRICT
INDIAN RIVER SCHOOL BOARD,
HARVEY L. WALLS, MARK A. ISAACS,
JOHN M. EVANS, RICHARD H. COHEE,
GREGORY A. HASTINGS, NINA LOU
BUNTING, CHARLES M. BIRELEY,
DONALD G. HATIER, REGINALD L. HELMS,
M. ELAINE McCABE, LOIS M. HOBBS,
and EARL J. SAVAGE

Defendants.

ORDER

The defendants motion for extension of time to respond to plaintiff's complaint is hereby GRANTED. The defendants shall have through June 13, 2006 to answer, move, or otherwise plead to plaintiff's complaint.

United States District Court Judge

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GRAPHIC ARTS MUTUAL
INSURANCE COMPANY

Plaintiff,

V.

.....

: Civ. Action No. 1:06-CV-0246 (JJF)

INDIAN RIVER SCHOOL DISTRICT
INDIAN RIVER SCHOOL BOARD,
HARVEY L. WALLS, MARK A. ISAACS,
JOHN M. EVANS, RICHARD H. COHEE,
GREGORY A. HASTINGS, NINA LOU
BUNTING, CHARLES M. BIRELEY,
DONALD G. HATIER, REGINALD L. HELMS,
M. ELAINE McCABE, LOIS M. HOBBS,
and EARL J. SAVAGE

Defendants.

CERTIFICATE OF SERVICE

PLEASE TAKE NOTICE that on May 25 2006, I caused a copy of the Motion for Extension of Time for Defendants to Respond to Plaintiff's Complaint to be served upon the following via hand delivery:

Timothy Jay Houseal, Esq.
Young, Conaway, Stargatt & Taylor
The Brandywine Building
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899-0391

/s/ Warren Pratt

Warren Pratt (DE Bar I.D. #4334)
DRINKER BIDDLE & REATH LLP
1100 N. Market Street
Suite 1000
Wilmington, DE 19801-1243
(302) 467-4200
(302) 467-4201 fax

Attorneys for Defendants